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Hon. Philip M. Halpern, United States District Judge
United States District Court for the Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *Chang et al. v. Shen Yun Performing Arts, Inc., et al.*, Case No. 7:24-cv-8980 (PMH)

May 23, 2025

Dear Judge Halpern:

We represent all of the Defendants in this case except the International Bank of Chicago. On behalf of our clients, we had prepared a memorandum of law in opposition to the motion of Plaintiff John Doe to proceed under a pseudonym and to submit evidence to the Court *ex parte* (ECF No. 70).

Yesterday, we received Your Honor's Order (ECF No. 79) suspending deadlines for responses to that motion, but it did not indicate whether our clients, who had not yet made a submission, should proceed to do so. Given that there will be a conference call among the parties and the Court on June 12, we propose to defer our submission until that time, unless the Court directs us otherwise.

We are grateful for Your Honor's attention.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Steve Schneebaum', with a long horizontal flourish extending to the right.

Steven M. Schneebaum

Counsel for the Shen Yun Defendants

Cc: All counsel of record, via ECF